Exhibit 1

From:	Baird, Mackenzie <mackenzie.baird@bipc.com>
Sent:	Wednesday, May 13, 2020 3:35 PM
To:	Robert Litts; Mario Moore
Cc:	Southall, Samantha
Subject:	RE: source code

Mario and Robert:

Thank you again for the discussion today and for providing the Bates numbers of the documents you believe are responsive to JBR's Interrogatory No. 1.

Based on our initial review, it appears that these documents are not responsive to this interrogatory, which seeks information related to the source code of the Keurig 2.0 Brewer. The file names and parent emails associated with these six documents indicate that these relate to the Keurig Kold beverage machine and a B79 brewer. These are not versions of the Keurig 2.0 brewer.

Although we disagree that your request is timely, we will work with you in good faith to locate and produce the source code for the Keurig 2.0 Brewer. Please confirm in writing that all plaintiffs agreed that any source code document produced will be treated as Outside Counsel Only under the protective order. We understand that you, on behalf of JBR, agreed to this condition during our second call today.

We will also agree to make Mr. Huang available for a deposition, though I cannot guarantee that this deposition will occur before May 20. We will work with you to schedule this deposition a quickly as possible.

Keurig does not agree to exclude Mr. Huang's deposition from the 500 hour limit on party depositions. You will need to discuss this matter with the other plaintiffs and collectively decide on how you wish to proceed with the time remaining. We also cannot agree to extend today's deadline for motions to compel that are ripe. Keurig served its responses and objections to this interrogatory in October. If JBR had an issue with that response, you should have raised those concerns much sooner. We will, of course, continue meet and confer with you in good faith, even if you feel it is necessary to file a motion today to protect your client's interests.

Thanks,
Mackenzie

Mackenzie A. Baird

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Buchanan Ingersoll & Rooney PC

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From: Robert Litts <robert@danjohnsonlawgroup.com>
Sent: Wednesday, May 13, 2020 5:04 PM
To: Mario Moore <mario@danjohnsonlawgroup.com>; Baird, Mackenzie <mackenzie.baird@bipc.com>
Cc: Southall, Samantha <samantha.southall@bipc.com>
Subject: RE: source code

Mackenzie, I also am available to talk again today at 6 pm EST. Following up on our meet-and-confer earlier this afternoon, the following ranges of documents produced by Keurig appear to include source code files for Keurig brewers at various stages of development:

- KGM05073965-KGM05097305
- KGM05110814-KGM05134174
- KGM05284130-KGM05302179
- KGM05097683-KGM05110773
- KGM04967257-KGM04967257
- KGM05204666-KGM05217714

These documents, which are attachments to emails that were produced from Jimmy Huang's files, appear to be responsive to JBR's Interrogatory No. 1. To the extent that these documents are, in fact, responsive to Interrogatory No. 1, JBR's position is that these documents should have been identified as such long ago. JBR requests the opportunity to depose Jimmy Huang as to the contents of these documents, and also requests that Keurig identify any other source code it has already produced, and supplement its document production with any additional source code Keurig has not yet been produced. Also, some of these files were not processed correctly during production, and therefore JBR requests that Keurig reproduce these files in either native or .pdf format. Also, please confirm Keurig's agreement that we can continue to meet-and-confer on this issue in an effort to avoid court intervention if possible, without prejudice to JBR's right to move to compel after today's deadline in the event we cannot reach agreement on these issues.

Best regards,

Robert Litts
Dan Johnson Law Group
Direct: (415) 937-6222
400 Oyster Point Blvd, Suite 321
South San Francisco CA 94080

From: Mario Moore <mario@danjohnsonlawgroup.com>
Sent: Wednesday, May 13, 2020 2:01 PM
To: Baird, Mackenzie <mackenzie.baird@bipc.com>
Cc: Robert Litts <robert@danjohnsonlawgroup.com>; Southall, Samantha <samantha.southall@bipc.com>
Subject: RE: source code

I will re-schedule one other call in order to free up to talk at 6.

Mario Moore
Dan Johnson Law Group
Direct: (415) 604-4445
Mobile: (408) 718-3537
400 Oyster Point Blvd, Suite 321
South San Francisco, CA 94080

From: Baird, Mackenzie
Sent: Wednesday, May 13, 2020 1:59 PM
To: Mario Moore
Cc: Robert Litts; Southall, Samantha
Subject: RE: source code

Mario and Robert:

Are you available to speak again at 6:00 eastern? Please send me the list of documents that we discussed at your earliest opportunity.

Thanks,
Mackenzie

From: Mario Moore <mario@danjohnsonlawgroup.com>
Sent: Tuesday, May 12, 2020 7:42 PM
To: Baird, Mackenzie <mackenzie.baird@bipc.com>
Cc: Robert Litts <robert@danjohnsonlawgroup.com>; Southall, Samantha <samantha.southall@bipc.com>
Subject: RE: source code

Mackenzie,

3:30pm Eastern works for us. Thank you.

Best Regards,
Mario

Mario Moore
Dan Johnson Law Group
Direct: (415) 604-4445
Mobile: (408) 718-3537
400 Oyster Point Blvd, Suite 321
South San Francisco, CA 94080

From: Baird, Mackenzie
Sent: Tuesday, May 12, 2020 4:39 PM
To: Mario Moore
Cc: Robert Litts; Southall, Samantha
Subject: RE: source code

Hi Mario – will 3:30 eastern work for you? If so, I will circulate a call-in number in the morning.

Mackenzie A. Baird

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From: Mario Moore <mario@danjohnsonlawgroup.com>
Sent: Tuesday, May 12, 2020 7:05 PM
To: Baird, Mackenzie <mackenzie.baird@bipc.com>
Cc: Robert Litts <robert@danjohnsonlawgroup.com>
Subject: source code

[This Email Originated From mario@danjohnsonlawgroup.com Which Is External To The Firm]

Hi Mackenzie,

I hope all is well.

Would you have availability for meet and confer regarding the source code issue tomorrow?

Thanks,
Mario

Mario Moore
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